

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Iva Bonelli	<u>Debtor(s)</u>	CHAPTER 13
Nationstar Mortgage LLC d/b/a Mr. Cooper	<u>Plaintiff</u>	ADV. NO. 21-00084 ELF
vs.		NO. 20-14471 ELF
Iva Bonelli	<u>Defendant(s)</u>	11 U.S.C. Section 362

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. On or about November 19, 2021, Plaintiff filed an Adversary Complaint against Debtor/Defendant.
2. On or about December 21, 2021, Debtor/Defendant filed a Motion to Dismiss Adversary Proceeding, specifically as to Count II, Unjust Enrichment, of Plaintiff's Complaint.
3. In resolution of Debtor/Defendant's Motion to Dismiss, the Parties agree to the following:
  - a. Count II shall be stricken from Plaintiff's Adversary Complaint.
  - b. The remaining Count I and Plaintiff's *ad damnum* clause shall otherwise remain.
  - c. Debtor/Defendant shall have thirty (30) days from the date of court approval of this Stipulation to file an Answer to Plaintiff's Adversary Complaint.

4. The parties agree that a facsimile signature shall be considered an original signature.

Date: December 27, 2021

/s/Rebecca A. Solarz, Esq.  
Rebecca A. Solarz, Esq.  
Attorney for Plaintiff

Date: January 5, 2022

Anthony A. Frigo  
Anthony A. Frigo Esq.  
Attorney for Debtor(s)

Approved by the Court this \_\_\_ day of \_\_\_\_\_, 2022. However, the court retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge